

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

IN RE NEUSTAR, INC. SECURITIES
LITIGATION

Case No. 14-CV-00885 JCC TRJ

**LEAD PLAINTIFF'S MOTION FOR FINAL APPROVAL OF
PROPOSED CLASS ACTION SETTLEMENT AND PLAN OF ALLOCATION
OF NET SETTLEMENT FUND, AND FOR FINAL CLASS CERTIFICATION**

Lead Plaintiff Indiana Public Retirement System, on behalf of the Settlement Class, will respectfully move this Court on December 3, 2015 at 10:00 a.m., before the Honorable James C. Cacheris, for Orders, pursuant to Rules 23(a), (b)(3) and (e) of the Federal Rules of Civil Procedure, granting final approval to the proposed Settlement of this class action; granting final class certification; and approving the proposed Plan of Allocation of the Net Settlement Fund. Defendants do not oppose the relief sought herein.

This motion is supported by a Memorandum of Law and Declaration of David J. Goldsmith with exhibits annexed thereto, both contemporaneously filed herewith, and all prior papers and proceedings in this action.

Proposed Orders will be submitted with Lead Plaintiff's reply papers, after the deadlines for objection and seeking exclusion have passed.

Dated: October 29, 2015

Respectfully submitted,

/s/ Elizabeth A. Aniskevich
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*Lead Counsel for Lead Plaintiff
Indiana Public Retirement System
and the Settlement Class*

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of October, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the registered participants as identified on the NEF.

/s/ *Elizabeth A. Aniskevich*

Elizabeth A. Aniskevich